

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

CLAUDIA WOODARD and ELISE LAWLESS,

Plaintiffs,

Case No. 09 Civ. 3000 (BSJ)(AJP)

-against-

TWC MEDIA SOLUTIONS, INC. and THE
WEATHER CHANNEL,

Defendants.

AFFIDAVIT OF JANET POILLON

STATE OF Connecticut
COUNTY OF Fairfield) ss.: Greenwich

Janet Poillon, being duly sworn, deposes and says:

1. I am familiar with the facts and circumstances set forth in this Affidavit. I make this Affidavit based on my personal knowledge, and/or my review of documents regularly maintained in the regular course of business by Defendants TWC Media Solutions, Inc. ("TWCMS") and The Weather Channel ("TWC"). I make this affidavit voluntarily, knowing that it will be used in legal proceedings.

2. I started working at TWCMS in late September 2004 as an Account Manager, reporting to Mark Gall. I had interviewed with Mr. Gall for the position and he decided to hire me although I had no prior national cable sales experience. In May 2007, Mr. Gall promoted me to Director of Sales. Mr. Gall always treated me with the utmost respect and professionalism.

3. I remain employed by TWCMS to this day, and my current title is Director of Sales. In the course of my career with TWCMS to date, I have reported to the following supervisors: Mr. Gall, Terry Sekel, Paul Iaffaldano and Chris Raleigh.

4. I have been compensated fairly throughout the course of my employment, and I have never felt that my compensation, account assignments, or any other aspect of my employment was negatively impacted by my gender.

5. During the time I worked with Mr. Gall, I never witnessed Mr. Gall make any inappropriate comments or take any inappropriate actions regarding race, national origin, color or gender.

6. In the Spring of 2005, Paul Celt and Jill Matrange left TWCMS. Following their departure, the majority of Account Managers, including me, had to pitch in and take responsibility for covering their accounts until new Account Managers were hired. Mr. Gall assigned to me the responsibility of covering Celt's portion of the McCann account, as well as Matrange's portion of the Mindshare account. Thus, throughout 2005, I worked longer hours and my job as an Account Manager was more challenging and taxing than it had been before Celt and Matrange left TWCMS.

7. During my employment at TWCMS, I observed that all TWCMS managers treated male employees and female employees equally. Further, during my employment at TWCMS, I observed that all TWCMS managers treated Caucasian employees and non-Caucasian employees equally.

8. During my tenure as an Account Manager at TWCMS, I always received the help I needed when I asked for it. At the beginning of my employment at TWCMS, Matt Derolla was an invaluable resource who helped me significantly.

9. Mr. Gall had a toy baseball bat in his office. I recall that the bat was no longer than 12-15 inches. I never witnessed Mr. Gall swing his toy bat at anyone or threaten anyone with his toy bat.

10. During my tenure as an Account Manager at TWCMS, Mr. Gall held Monday morning meetings beginning at 8:00 a.m. At 8:00 a.m., Mr. Gall would lock the door to the conference room. Thus, any Account Manager who arrived later than 8:00 a.m., whether male or female, Caucasian or non-Caucasian, would have been locked out of the meeting.

11. During my tenure as an Account Manager at TWCMS, Mr. Gall frequently made unscheduled, unannounced visits to my cubicle to ask me about the status of specific accounts. I regularly observed Mr. Gall making similar visits to every single Account Manager in TWCMS's New York office. It is my opinion that this is a good training tool and that Account Managers should be able at any time to discuss their assigned accounts with their supervisor.

12. During my tenure as an Account Manager at TWCMS, I did not have access to the "business on the books reports," or "Chimp reports" of other Account Managers. To my knowledge, these reports were not disseminated to Account Managers.


Janet Poillon

Sworn to before me
this 30th day of October 2009


Notary Public

DONALD MIGLIARDI
Notary Public, Fairfield County
My Commission Expires January 31, 2010